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Attorneys for Defendant
Subaru of America, Inc.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

**Christine Powell, individually and on
behalf of all others similarly situated,**

Plaintiff;

v.

Subaru of America, Inc.,

Defendant.

Case No. 1:19-cv-19114-NLH-JS

**Stipulated and Consent Order
for Amendment of Complaint
and to Extend Time
(Fed. R. Civ. P. 15(a)(2); L. Civ. R. 6.1(a))**

Counsel for Plaintiff, Christine Powell, and counsel for Defendant, Subaru of America, Inc., stipulate and consent, in writing, within the meaning of Fed. R. Civ. P. 15(a), that Plaintiff may file a second amended complaint in this action at any time through November 15, 2019.

Pursuant to L. Civ. R. 6.1(a), counsel for Plaintiff and Defendant further stipulate that Defendant shall have until January 15, 2020, to answer, move, or otherwise respond to Plaintiff's second amended complaint, and that any response by Defendant on or before that date shall be deemed timely.

Service of process of the Complaint (ECF No. 1) upon Defendant was effected on October 23, 2019. Pursuant to the Court's subsequent order (ECF No. 3), Plaintiff filed her

amended complaint on October 24, 2019 (ECF No. 5). Absent the above-stipulated amendment and extension, Defendant's deadline to answer, move, or otherwise respond to the Amended Complaint is currently November 13, 2019, and would otherwise be 14 days following Plaintiff's filing of the Second Amended Complaint. Thus, this stipulation extending time is being filed prior to the expiration of the period sought to be extended. No trial date has been set and no scheduling order has yet been entered in this action.

STIPULATED AND AGREED on November 6, 2019.

s/Peter Muhic

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Subaru of America, Inc.

ORDER

This Court has considered the attached stipulation, and

IT IS ORDERED that:

1. Plaintiff, Christine Powell, is given leave to file a second amended complaint on or before **November 15, 2019**; and
2. Defendant, Subaru of America, Inc., shall have until **January 15, 2020**, in order to answer, move, or otherwise respond to Plaintiff's second amended complaint.

Hon. Joel Schneider, U.S.M.J.

Dated: _____